

EXHIBIT B



Notice of Service of Process

null / ALL
Transmittal Number: 20146513
Date Processed: 07/26/2019

Primary Contact: Walgreens Distribution
Corporation Service Company- Wilmington, DELAWARE
251 Little Falls Dr
Wilmington, DE 19808-1674

Entity:	Walgreen Co. Entity ID Number 0501431
Entity Served:	Walgreen, Co.
Title of Action:	Stephanie Britt vs. Walgreen, Co.
Document(s) Type:	Citation/Petition
Nature of Action:	Personal Injury
Court/Agency:	Hays County District Court, TX
Case/Reference No:	19-1716
Jurisdiction Served:	Texas
Date Served on CSC:	07/25/2019
Answer or Appearance Due:	10:00 am Monday next following the expiration of 20 days after service
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	Robert Tyler 512-201-1500

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To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

CITATION
THE STATE OF TEXAS

CAUSE NO. 19-1716

STYLED: STEPHANIE BRITT VS. WALGREEN, CO.

TO: WALGREEN, CO., UPON WHOM PROCESS MAY BE HAD BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY DBA CSC - LAWYERS INCORPORATED, 211 E. 7TH STREET, SUITE 620, AUSTIN, TEXAS 78701

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 days after the date you were served this citation and petition, a default judgment may be taken against you."


Attached is a copy of the **PLAINTIFFS' ORIGINAL PETITION**, which was filed by the **PLAINTIFF**, in the above styled and numbered cause on the **15TH DAY OF JULY, 2019**, in the 453rd District Court of Hays County, San Marcos, Texas.

Issued and given under my hand and seal of said Court at San Marcos, Texas on this the 23rd day of July, 2019.

REQUESTED BY:

Robert Tyler
TYLER LAW
9442 Capital of Texas Highway, Plaza 1, Suite 500
Austin, Texas 78759
512-201-1500

BEVERLY CRUMLEY
Hays County District Clerk
Hays County Government Center
712 Stagecoach Trail, Ste. 2211
San Marcos, Texas 78666

By: 
Jane May, Deputy

OFFICER'S RETURN

Came to hand on the ___ day of _____ 20___ at _____ o'clock ___M and executed the ___ day of _____ 20___ by delivering to defendant _____ in person, a true copy of this citation with a copy of the petition attached thereto on ___ day of _____ 20___ at _____ o'clock ___M at _____ in _____ County, Texas.

[] Not executed. The diligence used in finding defendant being _____

[] Information received as to the whereabouts of defendant being _____

Service Fee: \$ _____

Sworn to and subscribed before me this the
_____ day of _____.

SHERIFF/CONSTABLE/AUTHORIZED PERSON
BY: _____

Printed Name of Server

NOTARY PUBLIC, THE STATE OF TEXAS

_____ County, Texas

DEFENDANT'S COPY

FILED
7/15/2019 12:48 PM
Beverly Crumley
District Clerk
Hays County, Texas

CAUSE NO. 19-1716

Stephanie Britt	§	IN THE DISTRICT COURT
<i>Plaintiff</i>	§	
	§	
vs.	§	
	§	_____ JUDICIAL DISTRICT
	§	
Walgreen, Co.,	§	
<i>Defendant</i>	§	
	§	OF HAYS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION

NOW COMES Stephanie Britt for her cause of action offers the following:

I. Parties.

1. Plaintiff Stephanie Britt is a resident of Hays County, Texas.
2. Defendant Walgreen, Co. ("Walgreens"). Service of said Defendant may be accomplished at Corporation Service Company D/B/A CSC – Lawyers Incorporated at 211 E. 7th Street, Suite 620 Austin, Texas 78701.

II. Discovery-Control Plan

3. Pursuant to Texas Rule of Civil Procedure 47, Plaintiff state that she seeks monetary relief over \$1,000,000 and a demand for all other relief to which she is entitled. Plaintiff intends to conduct discovery under Level 2 of Texas Rule of Civil Procedure 190.3.

III. Jurisdiction and Venue

4. The subject matter in controversy is within the jurisdictional limits of this court. This court has personal jurisdiction herein because Defendant is in business in Texas. Venue in Hays County is proper in this cause pursuant to Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events giving rise to this lawsuit occurred in this county.

IV. Facts

5. Plaintiff brings this action for personal injury sustained by her. On September 22, 2017, and prior and subsequent thereto, the Defendant Walgreens, owned, possessed, controlled, maintained, and managed the premises commonly described as Walgreens, Store # 15156, located at 6205 FM 2770, Kyle, Texas 78640, Hays County, Texas.

6. On September 22, 2017, the Plaintiff, Stephanie Britt, was a business invitee and customer of Defendants Walgreens Store, and as such invitee and customer, was properly on said premises.

7. On September 22, 2017, the Plaintiff, Stephanie Britt, was walking next to the frozen food aisle, when she slipped and fell due to a slick liquid that was on the common floor area, which was on the premises of the Defendants, Walgreens.

8. It was the duty of the Defendants, Walgreens, by and through its duly authorized agents, servants, and employees, to exercise all due care and caution for the safety of the Plaintiff and other members of the public on its premises, but the Defendant did not regard its duty, or use due care on behalf of the Plaintiff, by and through its authorized agents, servants, and employees in that behalf, and negligently and carelessly allowed the aforesaid premises unsafe to traverse by customers in its store.

9. On September 22, 2017, the Defendants, Walgreens, by and through its agents, servants, and employees, was there and then negligent in one or more of the following respects:

- a) Carelessly and negligently failed to provide reasonably safe premises for persons in said aisle;
- b) Carelessly and negligently failed to maintain said aisle;
- c) Carelessly and negligently permitted a slick liquid to be present on the floor in an area

where customers traversed;

d) Carelessly and negligently failed to warn customers of the presence of the slick liquid on the floor of said aisle;

e) Carelessly and negligently failed to clean the slick liquid on the floor of said aisle after it knew or should have known that the slick liquid presented a danger to its customers;

f) Carelessly and negligently failed to maintain the premises owned by the Defendants in a good and safe condition for the Plaintiff and others;

g) Failing otherwise to comply with the applicable laws and regulations of the State of Texas and the applicable Federal laws and regulations;

h) Carelessly and negligently failed to exercise the degree of care required under the circumstances;

i) Otherwise being negligent.

10. As a direct and proximate cause of one or more of the above set forth wrongful acts of negligence on part of the Defendants, by and through its duly authorized agents, servants, and employees, the Plaintiff suffered injuries, incurred severe pain and suffering, incurred medical expenses, and lost wages. Plaintiff has, may, and probably will for an indefinite time in the future suffer great pain, inconvenience, embarrassment, and mental anguish. Plaintiff has, may, and probably will for an indefinite time in the future be deprived of ordinary pleasures of life, loss of well-being, and her overall health, strength, and vitality has been greatly impaired, without any negligence of the Plaintiff contributing thereto.

V. Damages

11. Plaintiff seek recovery from Walgreens for her damages incurred as a result of the Defendant's negligence, Plaintiff sustained bodily injury as set forth above and also received

medical care for the injuries. In addition, Plaintiff suffers loss of sleep, lost work, lost earning capacity, pain and suffering and other mental anguish, disability in the past and future.

VI. Jury Trial

12. Plaintiff demands a jury trial and has tendered the appropriate fee.

VII. Conditions Precedent

13. All conditions precedent to Plaintiff's claim for relief have been performed or have occurred.

VIII. Request for Disclosure

14. Under Texas Rule of Civil Procedure 194, Plaintiff requests that Walgreens disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

IX. Prayer

15. For these reasons Plaintiff respectfully prays that Walgreens be cited to appear and answer herein, and that upon final hearing of the cause, judgment be entered against Walgreens for the economic, actual, and exemplary damages requested above, in an amount in excess of the minimum jurisdictional limits of the court, together with pre- and post-judgment interest at the maximum rate allowed by law, costs of court, and such other and further relief to which the Plaintiff may be entitled at law or in equity, whether pled or unpled.

Respectfully submitted,

/s/ Robert Tyler
Robert Tyler
State Bar No. 24009347
tyler@tylerlaw.us
TYLER LAW
9442 Capital of Texas Highway
Plaza 1, Suite 500
Austin, Texas 78759
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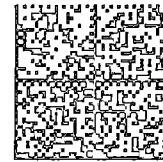
Attorneys for Plaintiffs



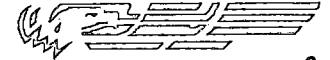
BEVERLY CRUMLEY
CLERK OF THE DISTRICT COURTS
HAYS COUNTY GOVERNMENT CENTER
712 S. STAGECOACH TRAIL, STE. 2211
SAN MARCOS, TEXAS 78666



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U.S. POSTAGE >> PITNEY BOWES



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0001372637 JUL. 24. 2019

Walgreen, Co.
Registered Agent Corporation Service Company
dba CSC - Lawyers Incorporated
211 E. 7th Street, Suite 620
Austin, Texas 78701

7870133218 CO15

